



## SMART Planning & Feasibility Study Implementation

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## SMART Planning and the 3x3x3 Rule

### How can I learn more about SMART Planning?

An overview of the SMART planning process and the [SMART Guide](#) is currently available on the [Planning Community Toolbox website](#). [Planning Bulletins](#) have been posted on the website to provide both information and updated guidance. Updates will continue to be posted on the site as additional [Tips, Tools & Techniques](#) are developed and refined, and as we learn from the planning efforts of ongoing studies.

[Webinars & Fact Sheets](#) provide overviews on the Foundations of SMART Planning, Milestones & Processes, Civil Works Transformation and Planning Modernization, Rescoping Charettes, and the Risk Register.

[Planning Core Curriculum \(PCC\) courses](#) have been updated to incorporate SMART Planning into training modules. Additional revisions will be made to PCC courses throughout Fiscal Year 13 and 14. On-demand webinars on a variety of SMART Planning topics will also be posted on the [SMART Guide](#).

If you cannot find an answer to your question on the [SMART Guide](#), please let us know – there is a link for [comments and questions](#), and a member of the Planning Community of Practice will answer your question.

### Is the target report length of 100-pages for the main feasibility report or an integrated report/environmental document?

The target length of 100-pages is for an integrated document. Although the target does not include appendices, the full report document and appendices should not exceed a single 3-inch binder.

### Can the feasibility document include all that is necessary to appropriately tell the planning story within 100 pages?

It is recommended to begin developing the feasibility study report from the beginning of the study: write early and often, write the report as you go, build upon the report synopsis. Feasibility study reports should focus on decisions and reasons for making those decisions more than documentation of data gathered and analysis conducted.

### Are Limited Reevaluation Reports, General Reevaluation Reports and watershed studies required to be 3x3x3 compliant?

All planning phase activities, regardless of the type of study, shall apply SMART planning principles. All studies should balance the level of uncertainty and risk with the level of detail of the study, include ongoing vertical team engagement of decision makers and identify the Federal interest early in the study, including the level of Federal and Corps interest and level of federal investment.

**Is the National Pilot Program for Feasibility Studies continuing and will there be more pilot studies?**

The current five pilot studies will continue to validate concepts of the SMART Planning paradigm such as vertical team integration, risk-informed decision making, and scaling the level of detail to the decision at hand. The pilot studies experiences will continue to provide lessons learned for feasibility studies across the Corps.

There will be no additional pilot studies. With the exception of the legacy studies that will be completed in upcoming months, all active studies in the Corps feasibility study portfolio are transitioning to SMART planning principles and processes.

**How will exemptions be considered and processed?**

[Planning Bulletin 2012-04](#), 3x3x3 Rule Exemption Process, explains the process for requesting an exemption from the 3x3x3 Rule. Requests will be submitted by the District Commander and endorsed to the Senior Leaders Panel by the MSC Commander.

**How does SMART Planning apply to ongoing (legacy) studies?**

“Legacy” studies are generally those that had completed a Feasibility Scoping Meeting before the [February 2012 MG Walsh Memo](#) RE: U.S. Army Corps of Engineers Civil Works Feasibility Study Program Execution and Delivery.

Until December 31, 2013, Districts may have both legacy studies and SMART Planning compliant studies underway. Beginning in Calendar Year 2014, all feasibility studies will be 3x3x3 compliant and use the SMART planning process and approach.

Legacy studies should whenever possible utilize SMART Planning principles, tools and techniques, applying critical thinking, using risk-informed decision-making and drafting clear and concise documentation. Since legacy milestones (such as the Feasibility Scoping Meeting and Alternatives Formulation Briefing) are completely different than SMART Planning milestones, it is not appropriate to substitute the milestones for one another. Legacy studies are expected to follow their current review plan and Project Management Plan, unless they are rescoping to be 3x3x3 compliant.

**Is the \$3M threshold the total feasibility study cost or the federal share?**

The \$3M threshold is the total feasibility study cost, including both the federal and non-federal sponsor share of the total cost.

**How was the 3-year duration and \$3M threshold selected?**

The three-year timeframe is not arbitrary. The [Planning Guidance Notebook](#) (ER 1105-2-100) states typical studies should be completed in 18-36 months. In addition, Section 2033(c) of Water Resources Development Act of 2007 ([WRDA](#)) directs that the benchmark goal for a study be within 2 years or generally up to 4 years.

The \$3 million target reflects the principle that studies should be scaled commensurate with complexity.

The Corps does not take a one-size fits all approach for feasibility studies. Complex studies, such as large watersheds and multi-purpose studies, may require time and funds beyond three years and three million dollars to complete. These complex studies are envisioned to be the exception rather than the rule.

**Why change from the former (legacy) feasibility study process to SMART Planning?**

The Nation's aging infrastructure, increased demands, and limited funding compel us to assess our ability to deliver studies and projects that meet the Nation's water resources needs. We must focus our limited resources on the highest performing programs and projects within the primary water resources missions of the Corps: commercial navigation, flood risk management, aquatic ecosystem restoration, and hurricane and storm damage reduction. SMART Planning will improve our methods of delivery and modernize the project planning process, both key [Civil Works Transformation](#) targets.

**What are the SMART Planning principles?**

Originally conceived as five "imperatives for change" for the Corps of Engineers feasibility study process, these principles underlie and inform SMART planning process and tools:

- **Uncertainty and Level of Detail.** Balancing the level of uncertainty and risk with the level of detail of the study. The level of detail required to make planning decisions will grow over the course of the study, as the study team moves from an array of alternatives to a single recommended alternative.
- **Vertical Team Integration.** Early and ongoing vertical team engagement of decision makers.
- **Determine Federal Interest.** Identify the Federal interest early in the study, including the level of Federal and Corps interest and level of federal investment.
- **Alternative Comparison and Selection.** There is no single "best" plan, and there are a variety of approaches (quantitative and qualitative) to multi-criteria decision making.
- **Funding and Resourcing.** Ensure that all resources needed for the study, including funding, human resources, data and information, are identified and available for the duration of the study.



## What is SMART Planning?

SMART Planning is focused on risk-informed decision making to the appropriate levels of detail for conducting investigations, so that recommendations can be captured and succinctly documented and completed in a target goal of 18-36 months in compliance with the 3x3x3 rule.

The online SMART Planning Guide provides a more comprehensive overview of SMART Planning and specific tools, tips and techniques for conducting studies. The [SMART Guide](#) itself, as well as recorded [Webinars & Presentations](#), has been provided to explain the foundations of SMART Planning and milestones and processes.

[Additional Directives & Guidance](#), including Planning Bulletin 2012-02, provide the methodology and the framework associated with SMART Planning, and a review of the process milestones of a SMART planning feasibility study.

The term “SMART” Planning is derived from the acronym:

- S: Specific
- M: Measurable
- A: Attainable
- R: Risk Informed
- T: Timely

## What is 3x3x3?

In an 8 February 2012 [Memorandum](#), the Deputy Commanding General for Civil and Emergency Operations (DCG-CEO) stated that effective immediately all feasibility studies that have not reached the “Feasibility Scoping Meeting” (FSM) milestone will follow a 3x3x3 rule: be completed in a target goal of 18 months but no more than three years; cost not greater than \$3M; and require three levels of vertical coordination. The target length of the main report for feasibility studies will be 100 pages or less.

All studies that have been funded for greater than five years have been reviewed and assessed by the USACE vertical team and sponsors to determine if they should proceed or be terminated. All studies that are proceeding, whether currently funded or temporarily on-hold, will be re-scoped in accordance to the 3x3x3 rule. Any study that exceeds the 3 years and \$3M will require justification and approval by the Deputy Commanding General for Civil and Emergency Operations (DCG-CEO). These studies are expected to be the exception. The 3x3x3 Rule Exemption Process is described in [Planning Bulletin 2012-04](#).



## **Feasibility Study Milestones & Documentation**

### **Does the Civil Works Review Board exist in the new Planning SMART milestone framework?**

At the Final Report Milestone, if the decision is controversial or complex, the Deputy Commanding General for Civil and Emergency Operations (DCG-CEO) may choose to convene a Civil Works Review Board (CWRB) before approving the final decision and NEPA documents and the proposed Report of the Chief of Engineers for release for State and Agency review and final NEPA review.

Because the DCG-CEO was briefed on the recommendation at the Agency Decision Milestone, a Civil Works Review Board should be the exception, only being convened if the recommended plan changes greatly after the Agency Decision Milestone or if a significant technical or policy issue arises.

### **What if the selected plan is not endorsed at the Agency Decision Milestone meeting?**

If the selected plan is not endorsed, the decision log will identify required actions of the team and the study will not proceed into the feasibility-level design stage until the senior leader panel endorses the selected plan. If there are significant changes to the selected plan that had been presented in a draft report during concurrent review, the public review process may need to be repeated.

### **Is there going to be an Agency Decision Milestone for every project under the new SMART milestone framework?**

There will be an Agency Decision milestone meeting for every study under the new framework.

Prior to this checkpoint, the Project Delivery Team has addressed comments raised during review and the vertical team has confirmed that the analyses in the draft report and the recommendations as a result of the concurrent reviews are compliant with policy and that there is a capable non-Federal sponsor(s) ready to support project implementation.

A panel of senior HQUSACE leaders chaired by the DCG-CEO will determine whether the selected plan will be endorsed. If the selected plan is endorsed, the Panel will also approve the Project Delivery Team's plan for feasibility-level design. The Agency Decision milestone meeting will be conducted by webinar or in-person and the briefing will be conducted by the District Commander, addressing public, policy, ATR, and IEPR comments and their resolution.

### **What is the report synopsis?**

The report synopsis is a distillation of the planning process. Early in the study, it is the core of the future more comprehensive feasibility study document. Typical elements in the report synopsis include: the problems and opportunities statement; a list of planning objectives and constraints; a list of decision criteria to be used for evaluation, description of the comparison and selection of the tentatively selected plan; key uncertainties in the study; a narrative description of the without project condition; a list of planning measures already screened/eliminated from consideration; and, names of formulated plans that are under consideration.



The PDT develops the Feasibility Report in iterations, with the draft report growing over time and confirmed at each milestone. A typical approach would be:

- Scoping Charette – first draft of Report Synopsis based on available data and planning expertise. The Report Synopsis document is intended to follow the study through all levels of the planning process. Studies early in development will not have enough information to complete each section. Enter the appropriate data as it is developed.
- Alternatives Milestone Meeting – updated Report Synopsis reflecting information developed from a second iteration of the six-step planning process.
- TSP Milestone Meeting – draft Report tells the story of the Problem, the alternatives considered, the without project conditions, and the rationale for the agency selected plan.
- Public Draft – builds upon the TSP milestone report to include the comparison and evaluation of the final array of alternatives, the identification of the TSP, and report appendices.
- Final Report Milestone Meeting – Final Report includes updated detail on the recommended plan addressing concurrent review comments, and technical and compliance report appendices.

**Are the legacy milestones being adjusted (FSM, AFB, CWRB) for legacy studies, or are they the same under current guidance?**

There is not a one-to-one correspondence between legacy milestones and SMART planning milestones. The SMART Planning milestones are planning decision points marking the development of the feasibility study and ultimately the recommended plan.

Active studies that reached a Feasibility Scoping Meeting (FSM) by 31 December 2011 may choose to continue to completion using the legacy milestones. These studies may instead, in coordination with their vertical team, decide to transition to the new SMART planning process milestones. This transition is most effective before a Tentatively Selected Plan has been identified.

All other active studies should work closely with their Vertical Team and develop a path to study completion under the SMART planning process and milestones.

**How are milestones to be transitioned from the old process to the SMART Planning process?**

The SMART planning process is applicable to all new-start studies and studies that are required to be rescoped based on the 8 Feb 2012 MG Walsh memorandum.

Project Delivery Teams may develop their plan to transition to the SMART Planning process as they see fit. Teams in transition have used: In Progress Review or other meeting(s); a [planning charette](#) with the participation of the full Vertical Team; development of a path forward including a Risk Register and Decision Management Plan for discussion / concurrence with the vertical team; etc.





## The Planning Team

### The Sponsor's Role

The [Water Resources Development Act of 1986](#) established a framework for partnerships between the federal government, represented by the Corps, and non-federal interests, represented by local project sponsors. The Act gives sponsors a key role in project planning and design, balanced by requirements for greater non-federal financial shares in the costs of studies and projects.

The role sponsors play as part of the Project Delivery Team (PDT) is described in [the Project Partnership Kit](#).

The fundamental role and responsibilities of the local sponsor in feasibility studies is unchanged in the SMART planning environment. The sponsor will:

- Enter into a feasibility cost sharing agreement (FCSA) with the Corps and provide 50% of the study costs in cash, or a combination of cash and in-kind services, in a timely manner so as not to delay the study.
- Actively participate in the discussions, decisions, reviews, etc. with the PDT and resource agencies.
- Coordinate, and possibly lead, stakeholder and public involvement efforts.
- Coordinate and lead regional and local alignment on participation and understanding of study objectives, the planning process, outcomes and recommendations.
- Work within the laws and Corps policies and guidelines to identify a plan with a federal interest, which may or may not include the locally preferred plan.
- Share knowledge and experience of the problem, project area, local conditions, environment and habitat, and design and maintenance issues related to the measures and alternatives under consideration.

### Who is on the Vertical Team?

Although the exact makeup of the vertical team may vary from study to study depending on the complexity and scope of the study, it will include decision-makers and technical expertise from the District, Major Subordinate Command (MSC) and Headquarters. A study's typical vertical team may include:

- Headquarters representatives, which may include Office of Water Project Review (OWPR) economics, environmental, and/or plan formulation expertise and technical expertise from Engineering & Construction, the Institute for Water Resources, or other Civil Works operations.
- MSC representatives include the MSC Planning Chief and other experts. For example, a deep draft navigation study may include the plan formulation, navigation, economics, environmental and engineering MSC experts. As the MSC's representative at Headquarters, the Regional Integration Team (RIT) provides a single point of contact for the MSC at Headquarters; they also are responsible for processing all work products requiring Headquarters-level review.
- Representatives from the appropriate Planning Centers of Expertise (PCX) can provide subject-matter expertise and experience.

**Who is on the Project Delivery Team?**

The study Project Delivery Team (PDT) is a multidisciplinary group assembled to develop the feasibility study. The team will be assembled to effectively and efficiently conduct and deliver the feasibility study, and will generally include staff within the district and other Corps offices, as well as project sponsor's staff, and representatives of other agencies. The PDT has ownership of the study.

The sponsor will be a member of the PDT and will play a key role throughout the entire project development process. The sponsor will share in the financial costs of studies and projects; and will provide the Corps with sponsor requirements with respect to budget, scope, quality, and schedule as well as any changes to these requirements.

Not all PDTs are the same, and the level of involvement of individual members may change over time. Some PDT members will be involved more than others, and the Project Manager will keep the PDT informed through each phase of the project.

**Charettes and Other Opportunities for Vertical Team Engagement**

**SMART planning assumes Vertical Team integration throughout the feasibility study. How will the MSC and HQ resources handle acceleration of studies and increased demand with limited available resources?**

There are and will continue to be measures taken to ensure effective participation of the Vertical Team given time and budget limitations and high workloads. For SMART Planning studies, the Vertical Team is expected to be able to provide more focused attention on policy discussions with the PDT due to the renewed emphasis on improved District Quality Control (DQC), with MSC Planning Chiefs ensuring that DQC is being consistently and appropriately conducted at Districts. In addition, more frequent Vertical Team participation early in the planning process, with more teleconference milestone meetings and more effective and concise documentation provided by the PDTs will ultimately benefit the SMART Planning process by significantly reducing lengthy read-ahead and review timeframes.

Time intensive efforts, such as planning charettes, have been shown to save time when decisions can be made and a clear path forward (Decision Management Plan) agreed to in days, rather than weeks. The Planning Community of Practice will continue to develop opportunities for effective remote participation during these more time-intensive efforts.

**Is a charette a requirement for my study?**

A charette is not a requirement but it is highly recommended, particularly for a new start feasibility study or reconnaissance study. The Project Delivery Team (PDT) and the Vertical Team may decide that a charette is appropriate for a Legacy study that is transitioning to SMART planning milestones or rescoping to meet 3x3 guidelines.

A charette may be more efficient than a series of short in-progress review meetings in order to align the Vertical Team with the PDT, to meet the team where they are at, and agree to a plan ahead for critical decisions from that point forward to the conclusion of the feasibility study.

The [Charette Handbook](#) on the SMART Guide is a useful reference and strategic resource for both in-progress reviews and charettes, including lessons-learned from the charettes conducted to date.

**Level of Detail in Feasibility Studies****Will doing less detail in the feasibility phase likely increase the amount of modifications and changes during the construction phase?**

We do not expect construction modifications and changes to increase due to implementation of planning SMART process. Feasibility studies are not intended to eliminate risk; they are intended to support good decisions in spite of the uncertainties and risks. The feasibility study will be focused on first developing sufficiently detailed information to distinguish between alternatives so that a recommended plan can be identified. The study tasks then turn to developing sufficiently detailed information about the recommended plan so that we can confidently report costs, benefits, and environmental & social impacts. Uncertainty will remain and will continue to be reduced during the PED phase.

The PDT can and should report the risks that accompany a given level of analysis, including the risk of construction modifications if known issues are not investigated. Choices can then be made to allocate resources to reduce the most significant risks while choosing to accept other risks.

**Does the SMART Planning approach move detail to the “Pre-Construction Engineering & Design” (PED) phase that could significantly change the project itself or its costs?**

The SMART Planning process is designed to ensure that no less detail is directed toward the team preparation of the recommended plan (and locally preferred plan, if applicable) during the feasibility study. The level of detail will be limited to a single alternative or small set of alternatives. [Engineering within the Planning Modernization Paradigm - Engineering and Construction Bulletin \(ECB\) 2012-18](#), dated 18 May 2012, outlines concepts and goals, defines a philosophy, and provides guidance for engineering efforts associated with feasibility studies under SMART Planning.

Having all concurrent review technical, policy, legal, public and Independent External Peer Review (IEPR), if applicable, comments at once, with vertical team alignment and endorsement of a recommended plan, will allow for improvement in the team’s understanding of the comments that need to be addressed during the feasibility-level design of the recommended plan.



At most, the risk of significant change to the project or its costs during Pre-Construction Engineering & Design (PED) would remain the same when comparing the legacy process to the SMART process, but will more likely have less risk of project changes when the team has used tools such as the decision management plan and risk register, and engaged early and often with the Vertical Team. Shortened average timeframes for studies will also reduce the risk of significant factors changing between the development of a recommended plan and PED.

**To meet the 100-page requirement in General Walsh's memo, will significant analysis have to be cut from the report?**

Districts should use SMART Planning principles to determine what is relevant to making risk-informed decisions instead of simply cutting portions of the report detail out. Data gathering and analyses should focus on areas critical to differentiating between alternatives. A risk-based decision making approach and the engagement (and concurrence) of the Vertical Team and other Corps disciplines/Communities of Practice in those decisions are crucial.

Information that is common to all the alternatives should be acknowledged (i.e., what is the minimal level of detail that is acceptable?). This could help define what components, at a minimum, must be included in feasibility studies.

Additional analysis and detail can be included in the appendices if it is necessary to tell the story of the recommended plan.

**Does SMART Planning require less detail in the feasibility phase?**

No. SMART Planning promotes frequent team communication on the risk of making decisions with information available at the time, asking the team to consider the remaining uncertainties, to determine the appropriate level of detail to support the next decision and the ultimate selection of a recommended plan. In this manner, the team will focus efforts on the identification of a reasonable and viable array of alternatives early in the study, analyze the array of alternatives with attention to NEPA compliance and other environmental considerations, select a plan, conduct concurrent review, and analyze the recommended plan (and locally preferred plan, if applicable) in detail and include important decisions made throughout the process in the final feasibility document.

## **Internal and External Reviews of Feasibility Studies**

**Does Agency Technical Review take place only on the draft report between the TSP milestone and the Agency decision milestone? Should ATR be conducted on the feasibility-level design of the Recommended Plan as well?**

ATR is required once the Chief, OWPR releases the report for public review at the TSP milestone. Since the ATR lead is involved in the study from the start, they will advise the PDT when additional review is needed. This could be on modeling results prior to the TSP milestone or on cost estimates and design during the Feasibility Level Design phase. The ATR Lead will decide what aspects of the study need further review using risk informed decision making.

**Is there a difference between legacy and SMART planning study review requirements?**

Review processes differ for legacy and SMART planning studies. The [Review Primer](#) summarizes requirements for SMART Planning studies. Updates have been made to [Guidance on Water Resource Policies and Authorities: Civil Works Review](#) (EC 1165-2-214, December 2012) to reflect both legacy study review requirements and SMART Planning requirements.

**How are reviews conducted in SMART Planning feasibility studies?**

Feasibility study review includes both internal (USACE) and external review processes, all detailed in the study's Review Plan.

Internal review includes quality control and quality assurance (QA/QC), technical, legal, and policy review. External reviews include public review required by NEPA and independent external peer review (IEPR), if needed.

District Quality Control (DQC) throughout the study is critical to the success of SMART Planning, as it ensures that other reviews – technical, policy, legal – can focus on their charges.

SMART Planning includes one-time concurrent review that includes Agency Technical Review (ATR), legal, policy, and public review along with IEPR, if needed. This occurs after the PDT and Vertical Team have identified a Tentatively Selected Plan and completed the draft report. Review comments will be addressed before the Agency Decision milestone.

Updated [Guidance on Water Resource Policies and Authorities: Civil Works Review](#) (EC 1165-2-214, December 2012) includes consideration of the SMART Planning process, milestones and concurrent review.

**Corps and Federal Guidance and Regulations and SMART Planning****Will the SMART Planning process require changes to existing legislation, policy, and guidance?**

The SMART Planning process has been implemented in large part without modifications to existing legislation, policies, or guidance. Several [Planning Bulletins](#) have been published to assist Project Delivery Teams in conducting feasibility studies.

If you feel a specific change to policy or guidance is needed, please contact the Planning Community of Practice SMART Planning implementation team through the [Comments or Questions](#) page of the online SMART Planning Guide on the Planning Community Toolbox.

The Planning Community of Practice will continue to incorporate SMART planning principles and processes into Corps of Engineers policy and guidance revisions.



## How do NEPA and other environmental compliance requirements fit into the SMART Planning process?

SMART Planning will meet the requirements of NEPA and other applicable environmental laws and policies, including [Engineer Regulation \(ER\) 200-2-2 \(Procedures for Implementing NEPA\)](#) and [ER 1105-2-100 \(Planning Guidance Notebook\)](#), offering opportunities to encourage efficient and thorough environmental reviews that will result in quicker and better-informed decisions. This approach falls in line with the White House Council on Environmental Quality ([CEQ steps to modernize and reinvigorate NEPA](#)), including a March 2013 publication of two new handbooks that encourage more efficient environmental reviews under the National Environmental Policy Act (NEPA) by integrating the NEPA process with the [National Historic Preservation Act \(NHPA\) Section 106 review process](#) and [California Environmental Quality Act \(CEQA\) review processes](#).

The NEPA compliance process is typically used as the vehicle for achieving compliance not only with the CEQ regulations (40 CFR parts 1500-1508), but also with a range of other environmental laws and executive orders, including but not limited to Section 7 of the Endangered Species Act, Section 106 of the National Historic and Preservation Act, Section 404(b) of the Clean Water Act, air quality conformity requirements under the Clean Air Act.

SMART planning does not eliminate detail from the integrated feasibility report/NEPA document; it is about developing the data at the right time and for the right alternatives as the study is conducted. A rigorous and credible comparison of alternatives will still be required. However, instead of a “rigorous” comparison of numerous alternatives, some of which would never be carried out based on technical, economic or environmental reasons, only those alternatives that are implementable would get the rigorous review. This is in alignment with NEPA, which indicates that when faced with a very large number of possible alternatives, you need only evaluate a reasonable range of alternatives. More information is provided in a SMART Planning white paper on [Environmental Evaluation and Compliance](#).

## Will the Planning Guidance Notebook be updated to reflect SMART Planning processes and milestones?

Ultimately, yes, although there are no immediate plans to update the [Planning Guidance Notebook](#). With the exception of direct references to legacy milestones such as the Alternatives Formulation Briefing, the fundamentals of the Planning Guidance Notebook are still applicable to current feasibility studies. The fundamental [Six-Step Planning Process](#) has not changed.

## Has the Corps of Engineers published guidance related to SMART Planning or 3x3x3?

Several Planning Bulletins, and Engineering and Construction Bulletin, a Real Estate Policy Guidance Letter, a memorandum from Chief Counsel and Civil Works Review guidance (EC 1164-2-214) have been issued to provide guidance to the field in the implementation of SMART Planning. These are available on the [Additional Directives & Guidance](#) page of the SMART Guide.